

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

JEFFERSON-PILOT LIFE INSURANCE CO.,	)	CASE NO. C-1-02-479
	:	
Plaintiff,	)	JUDGE SPIEGEL
	:	Magistrate Judge Hogan
vs.	)	
	:	AMENDED
CHRISTOPHER L. KEARNEY,	)	<u>NOTICE OF DEPOSITIONS</u>
	:	
Defendant.	)	

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, the defendant in the above matter will take the following depositions of plaintiff's employees and agents at the designated times and all at the offices of Accurate Court Reporting, 1500 Main Street, Springfield, Massachusetts:

Robert Mills	Thursday, May 13, 2:00 p.m.
William Hughes	Thursday, May 13, 5:00 a.m.
Todd Dittmar	Friday, May 14, 8:30 a.m.
Robert Bonsall	Friday, May 14, 11:00 a.m.
Janet Beattie	Friday, May 14, 2:00 p.m.

Also TAKE NOTICE that pursuant to Fed. R. Civ. P. 30(b)(6), the defendant in the above matter will take the deposition of Disability Management Services, Inc. ("DMS") on Thursday, May 13, 2004, at 9:00 a.m. at the same location and will cover the following topics:

1. The financial and other terms of Jefferson-Pilot Life Insurance Company's relationship with DMS, including but not limited to DMS' administration of Chris Kearney's benefits claim;
2. The information, communications, and documentation (including electronic communications) shared between J-P and DMS;
3. DMS' administration of Mr. Kearney's claim;
4. DMS' disability claim administration process, including the policies and procedures applicable to that process; and
5. J-P's Complaint, affirmative defenses, answers to interrogatories, and production of documents in this action.

All depositions will be conducted before a videographer and notary public or other officer duly authorized to administer oaths. The Deponents are further notified that the depositions shall continue from day to day until completed, and you may appear and take such part in the examination as you be advised and shall be fit and proper.

Dated: May 10, 2004  
OF COUNSEL:

GRAYDON HEAD & RITCHEY LLP  
1900 Fifth Third Center  
511 Walnut Street  
Cincinnati, Ohio 45201  
(513) 621-6464  
Cincinnati, Ohio 45201

Respectfully submitted,

/s Michael A. Roberts  
Michael A. Roberts (0047129)  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was filed electronically and thereby served this 10<sup>th</sup> day of May 2004 on William R. Ellis, Wood & Lamping, 600 Vine Street, Suite 2500, Cincinnati, Ohio 45202.

/s Michael A. Roberts